Privacy Policy Last updated June 2022



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1.00	06.2020	Original Document
2.00	16.06.2022	Minor update removing reference to Data Consent Form

This Privacy Policy applies to all activities of Faith at Work in Worcestershire (FWW), Registered charity no. 1176881. By engaging with us, you are agreeing to the processing of your personal information in accordance with this privacy policy.

1. OUR DATA PRIVACY PRINCIPLES:

- 1.1 We will respect your personal data.
- 1.2 We will store it securely.
- 1.3 We will process the minimum data about you in order to:
 - support you appropriately in your connection with Faith at Work in Worcestershire, (FWW).

- ii. enable us to work with you in providing a voluntary service as specified in our charitable constitution.
- iii. inform you of relevant news, events, training or services run by us or other similar organisations.
- iv. create and maintain anonymised numbers and stories of our work for learning, monitoring, promotion and fundraising that may be shared via a website and social media.
- v. use your image, name and stories about you in publicity and reports, if you give your consent.
- 1.4 We will only share your data with other people or organisations where:
 - i. This is needed to prevent harm to yourself or others (e.g. the Police, Social Services, NHS services)
 - ii. Enquirers are making a reasonable enquiry about specific workplace chaplaincy provision and have sought your permission
- 1.5 We will delete/rectify/restrict processing it when you ask us to, unless we need to retain information for safeguarding/legal purposes
- 1.6 You can request us to stop processing your data at any time but there are some circumstances when this will not be possible (i.e. for safeguarding/legal reasons)

2. WHAT DATA DO WE PROCESS, SHARE, HOW AND WHY?

- 2.1 We may process the following data about you:
 - i. Your name and contact details (address, phone, email etc)
 - ii. Your job title, role or position within an organisation
 - iii. Your church / faith affiliation, if applicable
 - iv. Your photograph and photographs, videos, recordings including you with your permission
 - v. Health issues you declare to us
 - vi. Your DBS status, if required in your role, and any results following a DBS check
 - vii. Emergency contact
 - viii. Minutes of meetings, phone calls and email conversations involving you
 - ix. Pastoral notes about your situation
 - x. Training records
 - xi. Donation records and information for Gift Aid claims

- xii. Information FWW is required to provide by law for an employee or a trustee
- 2.2 We may obtain your information through indirect collection:
 - i. your information may be shared with us by fundraising sites like online giving platforms (e.g. JustGiving), or by event organisers (e.g. Eventbrite). These independent third parties will only do this when you have specified that you wish to support FWW or attend an FWW event, and with your clear consent. You should check their privacy policy when you provide your information to understand how they will process your data
 - ii. your information may be shared with us via referrals from your church, chaplains, trustees, volunteers or staff
 - iii. your personal details may be available from public sources of personal information. (e.g. local church leader listed on public website)
- 2.3 We will keep personal data up to date; store and destroy it securely; protect personal data from loss, misuse, unauthorised access and disclosure, and ensure that appropriate technical measures are in place to protect personal data. We will not collect or retain excessive amounts of data.
- 2.4 We will carefully process personal data in order to:
 - enable us to provide a voluntary service as specified in our charitable constitution
 - ii. support people appropriately in their work, places of education and their homes
 - iii. administer records, organise events, meetings and training
 - iv. fundraise and promote the interests of the charity
 - v. manage our staff and volunteers
 - vi. maintain financial records and provide insurance covers
 - vii. inform individuals about news, events, activities and services
 - viii. create and maintain numbers and stories of our work for learning, monitoring, promotion and fundraising that may be shared via a website, email, newsletters, publications and social media. Personal data is used for publicity purposes. (e.g. a personal story in a newsletter, or a photo used on website). If your details are to be used for this specific purpose, your consent will be obtained prior to use.

- 2.5 We will treat personal data as strictly confidential. We will only share personal data with other workplace chaplaincy organisations and churches with your consent. We will share data when there is a perceived need to prevent serious harm to yourself or others, with other agencies e.g. police, health practitioners, social services etc.
- 2.6 We will retain data for no longer than necessary. In normal circumstances most data will be safely destroyed two years after last contact with a data subject. In the case of an employee or former volunteer, most data will be destroyed seven years after last engagement with that individual. If there has been a safeguarding concern or enquiry about an individual, we may be required to keep relevant data for longer. Notes of committee meetings may be archived indefinitely for future reference.
- 2.7 We may process data in this way on the following legal grounds
 - i. By consent where we use your information for a purpose based on consent, you have the right to withdraw consent for any future use of your information for this purpose at any time.
 - ii. In the case of employees acting on behalf of ourselves, processing of certain data is necessary for the performance of a contract
 - iii. In order to respond to requests from relevant authorities (eg. Police, Safeguarding, Insurance), processing is necessary for compliance with a legal obligation
 - iv. In responding to enquiries or in providing pastoral support for members of the public, processing is necessary for the legitimate interests of our purposes (except where such interests are overridden by your interests, rights or freedoms).
 - v. There is no disclosure to a third party without consent, unless a legal requirement to do so.

3. YOUR RIGHTS

3.1 Right to access your personal data

You have a right to see the data we hold for you. You can request this by a 'Data Subject Access Request'. We will respond to your request within 30 calendar days. There will be no charge to you for this.

3.2 Right to rectification

You have the right for inaccurate or incomplete data to be corrected within one month, although this can be extended to two months if the request is extremely complicated. If the data has been shared with third parties, we will inform them of the rectification.

3.3 Right to withdraw consent to process data

You are able to request a withdrawal of consent to process your data at any time. To do this, please contact us in writing. Since we may process some data on legal grounds other than consent (eg safeguarding, charity membership), we may continue to process such data under these grounds.

3.4 The right to request your personal data is erased where it is no longer necessary for us retain such data

You can ask us to erase your data when it is no longer necessary for us to retain it. Our retention policy for data is also controlled by other legal obligations – such as employment, financial, charity laws and safeguarding guidance.

3.4 The right to restrict processing

You can ask us to do no further processing of your data, where there is a dispute in relation to the accuracy or processing of your personal data. If processing is restricted, we can still store the data but cannot otherwise use the data.

3.5 The right to object to the processing of personal data

Where we use your data to contact you to promote events, etc or when we take legitimate pastoral notes of our encounters with you in furtherance of our charitable objectives, you can ask us to stop doing so.

3.6 To exercise your rights above, please contact us in writing:

Revd Dick Johnson
Faith at Work in Worcestershire
14b Top Barn Business Centre
Worcester Road
Holt Heath
WORCESTER
WR6 6NN

3.7 You also have the right to lodge a complaint with the Information Commissioners Office

If you have already made a complaint to us and you are not satisfied with the response: You can contact the Information Commissioners Office at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF (0303 123 1113; www.ico.org.uk)